



French & Hecht HW Silo 2

department of water, air and waste management

Regional Office #6 - 117 N. 2nd Ave., P. O. Box 27, Washington, Iowa 52353 - 319/653-2135

January 3, 1985

French & Hecht
Division of Kelsey Hayes Company
Attention: John Hays
P.O. Box #3310
Davenport, IA 52808

Dear Mr. Hays:

On November 8, 1984, a sample of paint sludge was collected from the big wheel paint booth. The analytical results for EP toxicity (copy attached) indicate the material did not display EP toxicity. This results in the fact only one of the three samples which I have collected from your big wheel paint booth has demonstrated EP toxicity for lead. Since this waste stream is somewhat variable in nature due to the different number and amounts of colors painted on the wheels, this office is requiring your facility to do one of the following:

- 1) Consider all paint sludge generated in the paint spray booths a hazardous waste and dispose of accordingly.
- 2) Test each batch of paint sludge removed from the paint spray booth and dispose of the material accordingly, after the results of the test become known.
- 3) Develop a plan and method of documentation which would justify a less frequent sampling procedure. This would require French & Hecht to undertake some study which would identify the origin of the lead contamination and the quantity at which it becomes critical in rendering the paint sludge a hazardous waste.

This office is requiring your facility to respond in writing with your decision by February 8, 1985.

If you have any questions feel free to contact this office.

Sincerely,

FIELD SERVICES DIVISION

David N. Whiting

David N. Whiting
Environmental Engineer
Regional Office #6

DNW:aw
Enc.

xc: Sharon Schaeffer, French & Hecht; Rod Vlieger, Central Office; File
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